

## **Chapter 6 – Comments and Responses**

In this Chapter:

- **Comments**
- **Responses**

The Draft EIS was distributed to agencies, groups, individuals and libraries on February 8, 2002. A 45-day public review period ended on March 25, 2002. Public meetings with an open house format were held in Ellensburg, Desert Aire and Richland Washington to review and receive comments on the Draft EIS. Comments were also received via phone, mail and email.

A follow-up letter was sent to people interested in the project on April 15, 2002. The letter identified the focus of comments received during the comment period and notified people of environmental and project design activities that would be occurring in the project area.

This chapter records and provides responses to the comments on the Draft EIS. This Final EIS also provides updated information developed based on comments received on the Draft EIS as well as additional information that has become available. Additions to the document are displayed as underlined text.

This chapter contains the written comments from letters and comment sheets, and oral comments from public meetings. Letter and comment sheets were recorded in the order they were received. Separate issues in each letter were given separate codes, for example, 1-1, 1-2, 1-3, etc. for issues in the first letter received. Comments from the public meetings were recorded similarly and are listed with code EL for comments from the public meeting held in Ellensburg, Washington, DA for comments from the public meeting held in Desert Aire, Washington, and RI for comments from the public meeting held in Richland, Washington. BPA prepared responses to individual comments. This chapter contains the coded comments from the letters and public meetings first, followed by the coded responses beginning on page 6-62.

Public Comments

Schultz-Hanford DEIS

RECEIVED BY BPA  
PUBLIC INVOLVEMENT  
LOG# SH00EIS-001  
RECEIPT DATE: FEB 13 2002

Telephone comment by Ginny Kuehn  
2/13/02

(Dr.) Richard Koch  
Olympia, WA  
(360) 352-7616 - office  
(360) 352-8197 - home

1-1 [ I am in favor of BPA's construction of the 500KV transmission line from BPA's substation Schultz to a new and existing substation near the USDOE and Hanford Reservation. I own land, 1600 acres right in that general area, 26 miles east of Moxee City.

1-2 [ Keep up the good work!

Schultz-Hanford DEIS

RECEIVED BY BPA  
PUBLIC INVOLVEMENT  
LOG# SH00EIS-002  
RECEIPT DATE: FEB 13 2002

Telephone comment by Ginny Kuehn  
2/13/02

Warren Hall  
(no other information given)

2-1 [ I received a letter from BPA regarding the new power line down across the Hanford energy reservation. I am in favor of that new power line going in there. So, rather than writing a letter, I called and responded to your letter. This can be a public record.

## Public Comments

BPA # 1225.094 (B-1898) (Priority of 271)		U.S. DEPARTMENT OF ENERGY BONNEVILLE POWER ADMINISTRATION CONVERSATION RECORD		Electronic Version Approved By OLC - 2/15/2002	
LOCATION OF VISIT/CONFERENCE N/A	TIME 4:50 p.m.	DATE (MM/DD/YYYY) 2/11/02	ROUTED DATE (MM/DD/YYYY) 2/11/02	RECEIVED BY BPA PUBLIC INVOLVEMENT LOG# SHDEIS-004 RECEIPT DATE FEB 14 2002	
NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU Julinda Tarver Personal Representative for John Nelson	TYPE <input type="checkbox"/> Visit <input type="checkbox"/> Conference <input checked="" type="checkbox"/> Telephone <input checked="" type="checkbox"/> Incoming <input type="checkbox"/> Outgoing <input type="checkbox"/> Other (Specify)				
ORGANIZATION/OFFICE	TELEPHONE NUMBER 206-546-6208				
SUBJECT Schultz-Hanford Area Project					
<p>3-1</p> <p>3-1</p> <p>I received a call from Ms. Tarver regarding property owned by John Nelson, her cousin, who is now deceased. Property involves several parcels in section 34 and one in section 27, Township 16 North, Range 23 East, Grant County, WA. Mr. Tarver requested information on location of the line and value of any easement BPA might want to acquire. In reviewing the proposed route, none of the parcels in sections should be effected. I explained that though the final route would not actually be determined until the RDO is issued that BPA's appraiser had already been working on values and as currently scheduled, someone would most likely be contacting her in the late March early April timeframe. She working on settling this estate and would like the sell the property.</p>					
ACTION REQUIRED					
DOSSAGE Paula J. Campbell	TITLE Realty Specialist	DATE (MM/DD/YYYY) 2/11/02			
ACTION TAKEN					
DOSSAGE	TITLE	DATE (MM/DD/YYYY)			
FILE COPY IN ATTENTION N/A					

Kuehn, Ginny -KC-7		LOG# SHDEIS-004 RECEIPT DATE FEB 8 0 2002
From: Sent: To: Subject:	Dressen, Laurens C - TNP-TTP-3 Wednesday, February 20, 2002 12:12 PM Witzpenn, Nancy A - KEC-4; Campbell, Paula J - TRF/Bell-1; Tyson, Ivy L - TNL-C-TTP-3; Kuehn, Ginny -KC-7; Rosales, Mari - TRF/Bell-1 Schultz - Hanford Area, phone call - Fran Chmielewski	
<p>4-1</p> <p>Fran called me today. She lives along Gage Rd. and is very concerned about our route around the Indian Allotment property. She really does not like the route for it would be a lot closer to her home which is located at the intersection of Gage Rd. and Cocke Canyon Rd. We apparently are already sending her the DEIS. I faxed her map #3 which has the details for that route. She would like to be kept up to date. Very concerned. She is a lawyer representing herself. Was nice to talk to.</p> <p>Lou</p>		

# Public Comments

RECEIVED BY BPA  
 PUBLIC INVOLVEMENT  
 LOG# SHJ/ELIS-0005  
 RECEIPT DATE: 1 LB 2 6 2002

8712240011  
 1005 Northfield Circle  
 Bellingham, WA 98228  
2-16-02

Lou Dressen  
 Project Manager  
 Dept. of Energy  
 Bonneville Power Admin.  
 Communications - KC-7  
 P.O. Box 12999  
 Portland, Or. 97212

Dear Sirs:  
 I don't object to a new transmission line - Schultz-Hanford area as long as it won't cross my property - Hanford-Wentworth. I already have a buried line crossing my property & 2 roads.

Sincerely,  
 V. Joyce Stuckert

State	231204-14004
"	14005
"	41002
"	41003
"	43002
"	43003
"	44000

RECEIVED BY BPA  
 PUBLIC INVOLVEMENT  
 LOG# SHJ/ELIS-0006  
 RECEIPT DATE: FEB 2 6 2002

Kuehn, Ginny -KC-7  
 From: Dressen, Laurens G - TNP-TPP-3  
 Sent: Monday, February 25, 2002 2:09 PM  
 To: Kuehn, Ginny -KC-7; Wittmann, Nancy A - KEC-4; Ellis, Liz M - KEC-4  
 Subject: FW: schultz-hanford trans. line project

-----Original Message-----  
 From: Richard Ambrose [mailto:rcabin@kvalley.com]  
 Sent: Friday, February 15, 2002 9:35 AM  
 To: kdriessen@bpa.gov  
 Subject: schultz-hanford trans. line project

Good morning Mr. Dressen,  
 Thank you to your agency for promptly sending out a copy of the DEIS on the Schultz - Hanford project. We live up in Cooke Canyon and I have contacted you before in 2001. We have all seen the survey markers that are running parallel to the existing line and knew this as proposed alternative A. My question is: Has this route changed because of the rather large cultural area near Coleman creek? Map between pg 3-94 and 3-95 shows this whole area to be sensitive. (Paine Cr. to Coleman Cr.) Being 5th generation in this valley I am aware of this part of the valley, particularly where Cobble and Caribou creeks come down, and how they have been dammed and altered. I have been told that the route has changed to the south. I only found one sentence referring to a change in the line position and it wasn't clear. The report is very impressive! Very educational! I appreciate all the work in completing this statement. Thanks for your time.  
 Sincerely,  
 Katie Ambrose

6-1 ☐   
 6-2 ☐

Page 1 of 1

## Public Comments

Wallace M. Stampfly  
2453 Charlton Road  
Ellensburg, WA 98926  
Jan. 14, 2001

Schultz-Hanford Transmission Line Project

1. When you develop alternative routes please consider:

Some of us already have large transmission towers passing through our property. In approximately 1965 BPA constructed a power line through a portion of my property on Sec. 27, 28, Range 19, Township 19. It is the only line that BPA constructed of its type. It loses the most electricity of any of the lines which come through the north foothills of the Kittitas Valley. This line is harmful to people and the environment because of power loss. One can actually get a light shock from barbed wire fences close to the lines. These lines are very noisy when it is raining and snowing. As you are probably aware, they glow at night when they are wet.

Since I already have one large line through my property, I would prefer not to have another one. Because of power loss questions as mentioned above, I question their safety for both animals and people. I do not feel it is safe to have so many large power losing lines located so closely together. If one is to be built, I would prefer it to be on the north side of the existing structures. Please consider whether lines can be consolidated with existing towers.

Every year I have inquiries about purchasing some of my land. These high power transmission lines take away from the value of the land. People do not want to be located close to them. What provisions do you have to make up for the devaluation of our property value due to your construction? I am from a third generation family on this livestock ranch, so I am very concerned about keeping the land in productive and safe condition.

Sincerely yours,

*Wallace M. Stampfly* 2/11/02  
Wallace M. Stampfly

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG# 5411215-7
RECEIVED DATE FEB 26 2002

Kuehn, Ginny -KC-7

From: Caspell, Paula J. -TRF/Bel-1  
Sent: Friday, February 22, 2002 2:42 PM  
To: Ellis, Liz M. -KEC-4  
Cc: Driessen, Laurens C. -TND-TPP-3; Rapozo, Sandra M. -TRF/Bel-1; Rozas, Nancy A. -TND-TPP-3; Kuehn, Ginny -KC-7  
Subject: FW: TRF/Bel-1

Here's one vote to keep the preferred route north of the existing line. -pjc

-----Original Message-----

From: Wolters, Eric USNAC  
Sent: Wednesday, February 20, 2002 4:32 AM  
To: 'Caspehl', Paula BPA  
Subject: TRF/Bel-1

Ms. Caspell, thank you for your letter and the map that you forwarded. I appreciate the time you took to respond in such a thorough manner. Based on what I remember of the topography and the area through which the proposed line will pass, it seems as though the preferred route is a very good choice. In any event, I would urge you to keep it to the north of the existing line. Thanks for the opportunity to comment. Eric Wolters

8-1

8-2

## Public Comments

RECEIVED BY BPA  
PUBLIC INVOLVEMENT  
LOG# SHJ015-010  
RECEIVED: MAR 06 2002

1700 Fowler Street  
Portland, Washington 97032

**Benton County Office of Sustainable Development**

1 March 2002

Bonneville Power Administration  
Public Affairs Office - KC-7  
Post Office Box 12999  
Portland, Oregon 97212

Re: Comments pertaining to the Schultz-Hanford Project DEIS

Dear Sir

Thank you for the opportunity to comment on the Schultz-Hanford Area Transmission Line Project Draft Environmental Impact Statement (Schultz-Hanford) - significant portions of which occur within Benton County. We have several questions/comments to provide, some relating to the document itself and others to the project in general.

Some of our thoughts regarding the Schultz-Hanford project:

- 10-1 While Benton County recognizes the need for this infrastructure, we are also aware of the impacts that transmission lines have on various resources. The best way to lessen impacts is to have as little new encroachment and construction as possible. When comparing the alternatives, it appears that this is the case with the Preferred Alternative. There are some unanswered or unclear points however:
  - 10-2 Is there a need for a completely new substation at Wisloma? Is there instead any opportunity to team with Benton REA, and cooperatively use - through expansion and upgrades - the existing facility at Blackrock?
  - 10-3 "Double circuit" infrastructure is being suggested for some areas, while parallel single circuit routing is recommended for others. Why is this? The double circuit system would appear to require less right-of-way and fewer structures, hence, less visual and habitat impacts.
- 10-4 We are particularly concerned with wildfire and weed issues in Benton County. Wildfire is a constant threat to public safety and property, and weed infestation is a growing silent epidemic with significant impacts to agriculture, native habitats, and cultural heritage.
  - There need to be fire and weed control plans associated with this project. Given that BPA has many miles of transmission lines throughout the arid Northwest, we assume that the agency has some experience in this area. Nonetheless, both construction and maintenance vehicle traffic present numerous and permanent opportunities for inflammation and for invasive plants to colonize remote areas and gain footholds. We suggest that BPA remediate in disturbed areas after construction by reestablishing native plant species and educating staff in fireweed reduction practices and techniques.

RECEIVED BY BPA  
PUBLIC INVOLVEMENT  
LOG# SHJ015-010  
RECEIVED: MAR 06 2002

1700 Fowler Street  
Portland, Washington 97032

**Benton County Office of Sustainable Development**

1 March 2002

Bonneville Power Administration  
Public Affairs Office - KC-7  
Post Office Box 12999  
Portland, Oregon 97212

Re: Comments pertaining to the Schultz-Hanford Project DEIS

Dear Sir

Thank you for the opportunity to comment on the Schultz-Hanford Area Transmission Line Project Draft Environmental Impact Statement (Schultz-Hanford) - significant portions of which occur within Benton County. We have several questions/comments to provide, some relating to the document itself and others to the project in general.

Some of our thoughts regarding the Schultz-Hanford project:

- 10-1 While Benton County recognizes the need for this infrastructure, we are also aware of the impacts that transmission lines have on various resources. The best way to lessen impacts is to have as little new encroachment and construction as possible. When comparing the alternatives, it appears that this is the case with the Preferred Alternative. There are some unanswered or unclear points however:
  - 10-2 Is there a need for a completely new substation at Wisloma? Is there instead any opportunity to team with Benton REA, and cooperatively use - through expansion and upgrades - the existing facility at Blackrock?
  - 10-3 "Double circuit" infrastructure is being suggested for some areas, while parallel single circuit routing is recommended for others. Why is this? The double circuit system would appear to require less right-of-way and fewer structures, hence, less visual and habitat impacts.
- 10-4 We are particularly concerned with wildfire and weed issues in Benton County. Wildfire is a constant threat to public safety and property, and weed infestation is a growing silent epidemic with significant impacts to agriculture, native habitats, and cultural heritage.
  - There need to be fire and weed control plans associated with this project. Given that BPA has many miles of transmission lines throughout the arid Northwest, we assume that the agency has some experience in this area. Nonetheless, both construction and maintenance vehicle traffic present numerous and permanent opportunities for inflammation and for invasive plants to colonize remote areas and gain footholds. We suggest that BPA remediate in disturbed areas after construction by reestablishing native plant species and educating staff in fireweed reduction practices and techniques.

## Public Comments

- There has been no extensive discussion of mitigation for habitat disturbance that we are aware of. All of the "action alternatives" will impact the already fragile, fragmented, and diminishing shrub-steppe ecosystem of the Columbia Basin. BPA should make an effort to recover these losses in other areas near the project. One possibility that BPA is aware of is the proposal to purchase the "McWhorter Ranch" property adjacent to the Hanford Reach National Monument. This proposal was made to BPA as part of the "Columbia Plateau" provincial review, but has so far been declined due to expense. Benton County is on record supporting this purchase, and we would again urge BPA to work with other involved parties to acquire this asset, including: Northwest Power Planning Council, Washington Department of Fish and Wildlife, and the Rocky Mountain Elk Foundation. This purchase would secure several thousand acres of well-managed shrub-steppe and rangeland for use as open space, recreation, and habitat restoration.

10-5

We also have two brief comments regarding the DEIS itself. First, that no maps appear in the summary document, even though maps are referenced several times and the alternatives are described in such fashion that maps are required for understanding. Some reviewers may only have the summary document and are therefore unable to have any visual context or references. Second, some of the maps that are included in the full document incorrectly label the "Hanford Monument" and do not graphically differentiate between the core Hanford Site and the Hanford Reach National Monument. This is an important distinction.

10-6

10-7

Again, thank you for the opportunity to comment on this project.

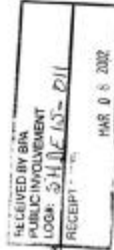
Sincerely,



Adam Ayall  
Hanford Coordinator

cc: Greg Hughes, Project Leader, Hanford Reach National Monument  
Jeff Tayer, Regional Director, Washington Department of Fish and Wildlife

From: Cindy and Art Kuebel  
1321 Thomas Road, Ellensburg, WA 99026  
February 28, 2002  
Regarding: The Shultz-Hanford Area Transmission Line Project



To: Bonneville Power Administration

We recently reviewed the draft E.I.S. for the proposed transmission line project, and were greatly impressed by the extent of the draft E.I.S.. We live within three miles of the Segment A Naneum-Wilson Creek crossings. We agree with the choice of the Preferred Alternative, but would like to see the following live points addressed, or addressed more completely, or changed in the final E.I.S..

1) Table 2.8-1 (Summary of Impacts), pg. 2-22 It is stated that "Trees may be removed in four riparian areas." We request that trees not be removed in these areas. The large cottonwoods in the riparian areas along the north edge of the Kittitas Valley are extremely important to wildlife, and are the trees of choice for roosting eagles and a number of hawk species. During the late winter we see a large number of raptors leaving these riparian areas every morning to disperse into the Kittitas Valley for the day. These large trees also help to stabilize water temperature, and control spring flooding; the more conscientious downstream farmers have for years attempted to keep their riparian forests intact for these very reasons.

2) We are concerned about the impacts to the vegetation (and therefore wildlife habitat) in both the riparian and shrub-steppe communities. This impact will not just be from BPA's line construction, but from public use of the maintenance roads after the line is constructed. People in four-wheel-drive vehicles frequently use dirt roads as launching points for off-road assaults. It would probably be impossible to keep people off of a new road if it is close to an existing road, unless both roads are gated. Please consider gating all maintenance roads in the Naneum-Wilson Creek areas, and in any of the more pristine shrub-steppe communities along the length of all segments. Alternatively, sign existing and new roads for no off-road use, and include some kind of line system for those caught off-road.

3) Water fords should be avoided, unless the roads are not accessible to the public (see above). We are not concerned with occasional BPA use, but are worried the public will use the roads to go "mudding" in accessible creeks and wetlands.

4) Conduct complete ground Threatened & Endangered plant surveys along the length of at least Segment A (summarized as the most pristine), and in other areas most likely to harbor T & E species. This would enable BPA to avoid or mitigate for T & E plant species along the route, potentially lessening the "moderate impact" listed in Table 2.8-1 (Summary of Impacts), pg. 2-24.

5) The spread of noxious weeds is a huge concern to us. Noxious weed spread into uninvaded areas via new access roads, and increased traffic can undo attempts by BPA to lessen environmental impacts along the segments; BPA already has a significant weed problem along some/all of its existing access roads. We recognize that agriculture is a significant source for many of these weeds, so we encourage BPA to work very closely with the counties to finally provide the significant weed control that is currently lacking.

Thank you for the opportunity to make our voices heard.

Cindy Kuebel Art Kuebel

Please make your botanist aware of the fact that I have found a total of 3 *Ilamnia longisepala* plants both above & below the proposed Naneum Creek crossing between Hanford Reach National Monument

11-7

## Public Comments

**BOONEVILLE POWER ADMINISTRATION**  
**Schultz-Hanford Area Transmission Line Project Draft Environmental Impact Statement**  
**Comment Form**

RECEIVED BY BPA  
PUBLIC INVOLVEMENT  
LOG# 54015-013  
RECEIPT DATE: MAR 13 2002

1. What are your comments on the Preferred Alternative? *Initially I favored another alternative, but after attending the public meeting in Ellensburg on Feb. 26 I feel confident that the preferred alternative is the correct choice.*

2. What are your comments on other alternatives? *I initially favored a more direct and shorter route through the firing center but did not consider the towers would become obstacles for aircraft.*

3. I need more information about \_\_\_\_\_

4. Additional comments \_\_\_\_\_

Please put me on your project mailing list. (You are already on the mail list if you have received mailed notice.)  
☐ Please remove me from the project mailing list.

Name WM. H. OR M. L. ADAMS  
Address 2002 DRY CREEK RD.  
ELLENSBURG, WA 98928

Comments by March 25, 2002 to:  
Booneville Power Administration  
Public Affairs Office - KC  
P.O. Box 12999  
Portland, OR 97212

**BOONEVILLE**

**WASHINGTON STATE DEPARTMENT OF Natural Resources**  
DOUG SUTHERLAND  
Commissioner of Public Lands

March 15, 2002

RECEIVED BY BPA  
PUBLIC INVOLVEMENT  
LOG# 54015-013  
RECEIPT DATE: MAR 19 2002

Lou Driessen  
Project Manager  
Department of Energy  
Booneville Power Administration  
Communications-KC-7  
PO Box 12999  
Portland, OR 97212

RE: TNN-TTP-3; SCHULTZ-HANFORD AREA TRANSMISSION LINE PROJECT.

Dear Mr. Driessen:

Thank you for the opportunity to comment on the Schultz - Hanford Area Transmission Line Project. The Washington State Department of Natural Resources (DNR) is the managing agency of those state Trust land parcels that would be impacted by the proposed project. As a result of our review, we recommend Route 3, the only route offered that has no impact to the state trust lands. However, we could support your preferred alternative, Route 2. Aside from Route 3, Route 2 has the least physical impact to the trust lands potentially impacted of the remaining three routes presented. We do not support Routes 1 or 1A.

If Route 2 is selected, then the following are specific comments and a specific request: Route 2 only impacts DNR land in Section 31, Township 13 North, Range 24 East. It is our understanding that BPA's plans for the parcel are to go vertical with another 550 KVA line on the existing towers. Apparently this will require an additional 25 feet to the west side of the existing 100 foot right of way but not change the existing footprint of the towers.

BPA folks at the February 26 public meeting indicated that the new towers could be shifted from their current locations. If this is indeed the case, then this letter is DNR's request that Booneville move the two towers on the edge of the circle located in the SE4 further out of the circle boundary to make farming more efficient, i.e., furtherance of unobstructed farming. We understand the tower within the circle in the SE4 must remain; the present tower in the NW4 will also remain at its present location. We understand the only impact will be the lessee in the NW4 being required to remove several rows of grapes to allow access to the tower in the current right of way. Our lessee knows this will happen after the 2002 crop is harvested if, indeed, Route 2 is selected.

Once a decision is rendered and if it does not include Route 3, I suspect we'll need to sit down and discuss the effects of any expansion of the right of way that will be needed and the process by which we'll address any footage increase in the current right of way path.

**SOUTHEAST REGION ■ 711 BOWERS RD ■ ELLENSBURG, WA 98926-9301**  
FAX: (509) 925-8522 ■ TTY: (509) 925-8527 ■ TEL: (509) 925-4519  
Equal Opportunity/Affirmative Action Employer

**RECYCLE MAPS**



## Public Comments

These are our comments for now. Again, we do appreciate you for giving us the opportunity to comment and hope you will incorporate them into your final decision. Please keep us posted on the project as you proceed.

Sincerely,



Dick Wedin  
Growth Management Coordinator  
Southeast Region

DW:ch

c: Bert Moon, DNR  
Duane Unland, DNR  
Mik Johnston, DNR  
Linda Hazlett, DNR  
Steve Wetzel, DNR



DEPARTMENT OF GEOGRAPHY AND LAND STUDIES

March 16, 2002

To: Bonneville Power Administration  
Communications—KC7  
P.O. Box 12999  
Portland, Oregon 97212

I am writing specifically about one particular area in Segment A of the Schulz-Hanford Area Transmission Line Project. That area is roughly encompassed by Map # 3 of your Draft Environmental Impact Statement.

As Appendix H correctly points out:

Significant cultural resources are categorized as historic and archaeological properties, properties of traditional and cultural significance, sacred sites, and cultural landscapes, which are all recognized and protected under federal mandates (Appendix H, page 8).

I wish to inform you that your proposed reroute lies in an area that very likely contains all of the above. Rerouting of this corridor will require intensive field and archival research and the evaluations of significance will require assessment not only of the subject properties but the development of the ecological and cultural context for those evaluations. For example the proposed reroute obviously crosses through distributions of historic artifacts associated with early agricultural settlement of the valley and the distributaries of Cooke Creek are direct expressions of the emergent irrigated agricultural systems in the Kittitas Valley. Their significance, under the National Register of Historic Places, will require the development of extensive documentation at the landscape and place spatial scale of these culturally important historic features.

The mouths of canyon systems like Cooke and Coleman creeks are marked by extensive alluvial fan deposits. These fan systems are dynamic and characterized by shifting channel patterns through time. The resulting landscape is one of a complex interface of riparian and shrub-steppe habitats. Sullivan (2000) gives a detailed reconstruction of this complex mosaic prior to major alteration by agriculturally based human systems and is the most complete evaluation of the landscape that supported the encampment observed by Alexander Ross. This encampment includes the areas of the proposed reroute:

14-1

400 E. 8th Avenue • Ellensburg WA 98926-7420 • Lind Hall 119 • 509-963-1188 • FAX: 509-963-1047  
ISSUED WITH A PERMIT FROM THE WASHINGTON STATE DEPARTMENT OF ECOLOGY

## Public Comments

14-3  
cont.

paths of this complex system. Because numerous springs emerge immediately south of the proposed reroute extensive modeling of subsurface preferential flow paths through this fan systems will be required prior to the construction of towers in the proposed reroute.

14-4

The Draft EIS is a vague description of the proposed route and primarily based on existing information. It is clear from reading both the EIS and the references that the spatial scale of the information contained is not sufficient to assess the specific details, and in some cases even the general nature of the cultural and ecological impacts from the proposed routes. In the case of the proposed reroute detailed field based, archaeological, ethno-historical, and biophysical research will be required to determine the potential impacts.

Thank you for the opportunity to comment.

Always,

  
 Professor Morris L. Uebelacker

Sullivan, Allan, E. 2000. The Expected Potential native Vegetation of the Kittitas Valley, Central Washington: A soils Based Approach to the Reconstruction of Vegetation Landscapes. Ph.D. Dissertation, Oregon State University, Corvallis, Oregon.

Spaulding, K.A. (ed.)

1956 Fur Hunters of the Far West: Alexander Ross's Narrative, (reprint of 1855 edition). Norman, Oklahoma: University of Oklahoma Press.

#### Ross's Observations in the Kittitas Valley, 1814

At that place all the Indians were rich in horses; the Cayouses, Nex Perces, and other warlike tribes assemble every spring to lay in a stock of the Favourite kamass and pelica, or sweet potatoes, held in high estimation as articles of Food among the natives. Here also the Indians hold their councils and settle the affairs of peace and war for the year; it is therefore, the great national rendezvous, when thousands meet and on such occasions horses can be got in almost any numbers, but owing to the vast concourse of mixed tribes, there is always more or less risk attending the undertaking.

... we entered the Eyaikema Valley, "the beautiful Eyaikema Valley," so called by the whites. But on the present occasion there was nothing either beautiful or interesting to us; for we had scarcely advanced three miles when a camp in the true Malchike style presented itself. A camp of which we could see its beginning but not the end! This mammoth camp could not have contained less than 3,000 men, exclusive of women and children, and treble that number of horses. It was a grand and imposing sight in the wilderness, covering more than six miles in every direction. Councils, root gathering, hunting, drumming yelling, and a thousand other things which I cannot mention were going on... the din of men, the noise of women, the screaming of children, the tramping of horses, and howling of dogs was more than can well be described. (Spaulding, 1956)

The camp Ross saw in the early 1800's reflected the regional economic and social importance of the Kittitas Valley to the native people. It reflects a time when native peoples and goods moved from the Coast to the eastern Rockies through a complex network of social and economic relationships. The camas roots from the meadows of the Kittitas Valley, the desert roots from the foothills, the horses, manufactured products, and other resources from Kittitas region found their way to the winter hearth and home of native people throughout the Columbia River Basin. The land the pioneer cattleman and farmers saw as open, awaiting beast and plow, was already settled. It had been settled for thousands of years.


Other historical accounts and oral histories amplify the former importance of anadromous fish in these streams and the archaeological deposits existing in this area are significant for the ecological and cultural information they contain. It is extremely likely that buried archaeological places exist in the proposed reroute and substantial surface and sub-surface evaluations will be required.

Of particular significance both culturally and ecologically are the spring systems that exist in the area of the proposed reroute. These springs are long-lived features in this landscape and many provide water at low flow. The placement of towers across this alluvial fan system has the very real potential to directly impact the preferential flow

14-2

14-3

# Public Comments



**PLANNING DEPARTMENT**  
128 North Second Street • Room 417 • Courthouse • Yakima, Washington 98901  
(509) 574-2230 • 1-800-572-7354 • FAX (509) 574-2231 • <http://www.co.yakima.wa.us>

RECEIVED BY BPA  
PUBLIC INVOLVEMENT  
LOG# SHDEIS-015  
RECEIPT # 6 MAR 21 2002

RE: Comments on Schultz-Hanford Transmission Line – (TNN-TYP-3) (DO/EIS-0325)

March 16, 2002

BPA  
Communications – KC-7  
P.O. Box 12999  
Portland, OR 97212

Dear Sirs:

Thank you for the opportunity to review the Draft Environmental Impact Statement for this project.


Yakima County normally has jurisdiction over land use and critical areas within the County. An exception to this is projects on federal land. I do not know if the right-of-way for the transmission line will be federally owned or if it will be owned by a private company/utility. If it will be privately owned, permits will be required.

Most linear uses such as power lines, utilities, and roads do not require land use review. However, many linear projects, such as this transmission line, encounter critical areas. Critical areas along this project include larger and smaller Type 3 streams. If the project is non-federal and will require work across a stream or wetland, the project will need Critical Area Permit review. In addition, accessory facilities (such as substations, monitoring buildings or similar above ground structures) require zoning review.

The comments below are general in nature, and relate to streams and wetlands. They would apply to all segments equally, in addition to Segment C in Yakima County. Roads often directly follow transmission lines. If such is the case for this project, the roads will cross many large and small streams and/or wetlands. Stream crossings should use at-grade fords for intermittent (Type 3) streams, since that is the least impact/least cost least maintenance options. Crossings for perennial streams should use existing crossings (State or County bridges) rather than creating new ones. Roads should be diverted around wetlands. Towers and work areas should be placed in upland areas rather than within the critical areas or buffers.


Again, thank you for the opportunity to comment on this project. If you have any questions, feel free to call me at 574-2230.

Sincerely,

  
DEAN PATTERSON  
Zoning and Environmental Manager

G:\SEPA and WETUSERS\DEANP\BIS\REVIEWS\shultz-hanfordEIS.doc

"OUR MISSION: TO HELP OUR COMMUNITY DEFINE AND ACHIEVE ITS PREFERRED FUTURE"



**State of Washington**  
**DEPARTMENT OF FISH AND WILDLIFE**  
Region 3 Office, 1701 South 24<sup>th</sup> Street • Yakima, Washington 98902-5720 • (509) 575-2740

RECEIVED BY BPA  
PUBLIC INVOLVEMENT  
LOG# SHDEIS-016  
RECEIPT DATE MAR 22 2002

March 21, 2002

Department of Energy  
Public Affairs Officer - KC-7  
ATTENTION: Lou Dreissen  
P.O. Box 12999  
Portland, OR 97212

Dear Mr Dreissen:

**SUBJECT: NEPA-Draft Environmental Impact Statement - Schultz-Hanford Area Transmission Line Project; Bonneville Power Administration, Construct Transmission Line and associated access roads and water crossing structures, Yakima, Grant, Benton, and Kittitas Counties, WRIA's 37, 39, 40**

The Washington Department of Fish and Wildlife (WDFW) has reviewed the above-referenced National Environmental Policy Act (NEPA) document received on March 8, 2002, and offers the following comments at this time. Other comments may be offered as the project progresses.

We continue to support Alternative 2, which has been selected as the preferred alternative in the Draft Environmental Impact Statement (DEIS). The DEIS provides a thorough review of the affected environment and environmental consequences of this project. In addition, the mitigation recommendations provided and the incorporation of our previous comments in the DEIS have addressed many of our previous concerns regarding potential project impacts. However, due to that lack of site specific details with regard to the locations and methods to be used to implement the project, such as the locations and methods used for water crossing structures, some concerns regarding the project remain.

It also appears that there are alternatives available which could further reduce some of the identified environmental impacts. Double circuit towers are only proposed within the eight mile area consisting of agriculture near Mattawa. While these taller 170 foot tower could not likely be used on the Yakima Training Center, we don't understand why they cannot be used on the remaining portions of the project. Use of double-circuiting would avoid the need for two separate sets of towers and the associated loss of habitat.

**Fish Resource Impacts**

16-1

16-2

## Public Comments

Lou Dreissen, BPA  
March 21, 2002  
Page 2

16-3

The DEIS indicates that there will be several stream crossings associated with both new and improved access roads proposed throughout the project. Hydraulic Project Approvals will be required for installation and maintenance of all proposed water crossing structures. There is insufficient information in the DEIS to determine if additional mitigation will be necessary for these projects, especially with regard to the 10 fish bearing streams which will be crossed by access roads.

16-4

We concur with the recommended mitigation measures within the DEIS that all towers be placed at least 200 feet from the ordinary high water line of fish bearing streams. We also support the use of existing water crossing structures whenever possible to avoid the need for new structures. The recommended application of BMP's within the DEIS for road construction and maintenance should be implemented to avoid sedimentation of fish bearing waters.

#### Permitting

16-5

It appears from the general description of the project, that a Hydraulic Project Approval (HPA; Chapter 77.55 RCW, WAC 220-110) to be issued by WDFW, will be required for the project.

16-6

There is, however, insufficient project detail to determine specific conditions or mitigation to be placed on the project at this stage of the project development. We encourage you to seek involvement from WDFW on resource needs and typical project requirements to insure proper protection of fish life as you proceed with project design and development. Early involvement with WDFW will facilitate later processing of the HPA. Once final design plans are available, please submit a completed Joint Aquatic Resource Permits Application (JARPA) for an HPA, including complete plans and specifications, to WDFW for review.

16-7

The plans and specifications should be developed relative to the ordinary high water line. The drawings should accurately depict existing conditions including all prominent natural features and manmade improvements in the water and on the bank in the immediate vicinity of the project area. They should include plan and cross-sectional views of the proposed project, a vicinity map of the project area, and accurate directions to the project site. In addition, to aid us in locating the project site, a photograph should be supplied.

JARPA forms are available from WDFW or most local government permit offices. You should allow 45 days from the receipt of a complete application and written notice of compliance with the SEPA process for processing of the HPA.

#### Wetland Impacts

16-8

Although the DEIS identifies wetlands within the project route, there appears to be insufficient information to determine to what extent they will be affected by the project. The proposed access roads and other associated structures should be located to avoid impacts to those wetlands. In instances where structures must be placed within or near wetlands, delineations should be completed to determine mitigation requirements.

Lou Dreissen, BPA  
March 21, 2002  
Page 3

#### Unmitigated Impacts

16-9

While the DEIS identifies the Environmental Consequences and provides means to avoid most of the potential environmental risks associated with the proposed project, it also itemizes impacts which cannot be avoided. We concur with the findings of Section 4.15 on page 4-120 identifying the "Adverse Impacts that Cannot be Avoided", and that the project will contribute to an increased level of habitat fragmentation and a reduction in available shrub-steppe vegetation for wildlife habitat.

16-10

Unmitigated impacts include the area of habitat which will be lost through construction of roads, improved roads, pulling and reeling, staging areas, substations, water crossing structures, riparian corridors, and well as other cumulative impacts. While it is relatively easy to total the acreage of impacts habitat, cumulative impacts and disturbance associated with the projects is more difficult to assess.

Section 2.7 of the DEIS indicates that the road disturbance associated with the preferred alternative will result in 340.7 acres of habitat disturbance. Section 4.5 indicates that the tower pads will result in the loss of 71.7 acres, and Section 2.9 indicates that an additional 25 acres of shrub-steppe will be lost to substation installation. This appears to indicate that 437.4 acres of shrub-steppe habitat would be lost through implementation of the preferred alternative, not including impacts associated with wetlands and equipment staging areas.

Table 4.1-1 on page 4-5 indicates that the access roads and towers in the preferred alternative will result in disturbance of 411.8 acres. However, it is not clear if the additional shrub-steppe impacts associated with improving and widening existing roads are included in this calculation. It is also assumed that this does not include substations, pulling and reeling areas, and staging areas, or the additional five acres of forested habitat, which the DEIS indicates will also be lost.

16-11

It appears that the total direct loss of shrub-steppe habitat will be between 400 and 500 acres. Direct loss may be reduced if restoration and revegetation work is implemented in the project corridor. Additional impacts to fish and wildlife which are likely to result from implementation of the preferred alternative include, the linear distribution of noxious weeds, birds strikes, some loss of ecological connectivity due to habitat fragmentation.

WDFW's mitigation policy is to seek greater than 1:1 mitigation ratios for impacts or direct loss of fish and wildlife habitat. Three to one (3:1) ratios are typically used. A 3:1 to 5:1 mitigation ratio is valid for shrub-steppe due to: 1) difficulty in restoring habitats in arid environments; 2) length of time to restore a climax community (20-30+ years for sagebrush); 3) fragmentation impacts beyond those of direct habitat loss by roads, towers etc (e.g. transmission line built through remnant block of shrub-steppe reduces the ecological connectivity and functionality of the whole block even though most habitat is not directly disturbed).

With consideration of expected cumulative impacts it appears that the preferred alternative will conservatively require acquisition or protection of a minimum of 1200 to 1500 acres of shrub-steppe habitat to mitigate for impacts which cannot be avoided.

## Public Comments

Lou Dreissen, BPA  
March 21, 2002  
Page 4

It is difficult to evaluate impacts and develop suitable mitigation through a piecemeal approach whereby each project is considered individually and not in context with all BPA's proposals in south central and south eastern Washington. Independent biological assessments of the environmental impacts of multiple projects in shrub-steppe habitat often does not fully assess the combined cumulative effects on the landscape.

16-11  
cont.

It is assumed that the other proposed projects associated with wind power, transmissions lines, substations, and gas turbine power plants identified in the DEIS, will also require some mitigation. We strongly advocate the development of a comprehensive mitigation banking plan which consolidates necessary mitigation for all proposed projects. Scientific literature indicates that shrub-steppe habitat owes a great deal of its functionality to large, contiguous blocks, and mitigation banking is a valid means of mitigating for loss of shrub-steppe vegetation. Mitigation from each proposed project could be banked to secure large blocks of relatively intact shrub-steppe habitat. The mitigation banking effort could be coordinated through BPA's existing Fish and Wildlife programs.

Thank you for the opportunity to provide these comments. We look forward to meeting with you regarding mitigation opportunities and development of a comprehensive mitigation plan. If you have any questions, please contact me at (509) 457-9314.

Sincerely,

Ted A. Clausing  
Regional Habitat Program Manager

cc: Peter Birch, Deputy Assistant Director, Habitat  
Jeff Tayer, Regional Director, Region 3  
Cynthia Pratt, SEPA Coordinator, WDFW  
Perry Harvester, Habitat Biologist  
Lee Streams, RWPM, Region 3  
Brent Retiflow, AHB, Ellensburg  
Don Larsen, AWB, Pasco

Kuehn, Ginny -KC-7

From: Theodore Clausing [CLAUSTAC@dfw.wa.gov]  
Sent: Friday, March 22, 2002 8:41 AM  
To: comment@boa.gov  
Subject: WDFW comments on the Schultz-Hanford DEIS



Microsoft Word 7.0

Washington Department of Fish and Wildlife comments regarding the Schultz-Hanford Transmission Line Project DEIS are attached. A hard copy of the letter was also mailed yesterday, but may not arrive by March 25th. Thank you for the opportunity to provide these comments.